

Mayer Brown LLP  
1999 K Street, N.W.  
Washington, D.C. 20006-1101

Main Tel +1 202 263 3000  
Main Fax +1 202 263 3300  
www.mayerbrown.com

**John S. Hahn**  
Direct Tel +1 202 263 3346  
Direct Fax +1 202 263 5346  
jhahn@mayerbrown.com

December 4, 2015

VIA UPS OVERNIGHT DELIVERY AND E-MAIL

Claire Hong  
U.S. EPA, Region 10  
1200 Sixth Avenue  
ECL-122  
Seattle, WA 98101

Re: Quendall Terminals Superfund Site in Renton, WA

Dear Claire:

Please allow this letter to serve as the response of Frontier Communications Corporation to the letter dated October 7, 2015 from Shawn Blocker to Mark Nielsen.

First, thank you very much for the courtesies you and Ted extended to us with respect to the meeting you hosted on November 10, 2015. It was very informative.

Since the meeting, we have spoken to counsel for various of the Potentially Responsible Parties. We also have searched for records responsive to EPA's information request dated September 15, 2015, and we are scheduled to begin responding to that request next month. We also have been in touch with EPA concerning a response to a broad FOIA request that we submitted to the Agency on October 27, 2015 concerning the site. Apparently it will take the Agency a number of months to provide the requested records, which is understandable in light of the many years the site has been administered.

Since Frontier has been on notice of this matter for only a couple of months, we certainly do not yet have a grasp of all the relevant facts, which I'm sure will become more clear over the coming months. As you know, EPA has not made any determination that Frontier is a PRP with respect to the site. Based on the facts already apparent, it appears unlikely that there will be any basis for making such a determination. Accordingly Frontier must respectfully decline to make an offer to conduct the "pre-Remedial Design" work that EPA wishes to have done.

I assume the site owners can and will proceed to conduct the requested work, which I believe is within the scope of the commitment they made to conduct the RI/FS and other work required by the Agency.

Mayer Brown LLP

Claire Hong  
December 4, 2015  
Page 2

I remain available to discuss these issues with you and Ted at your convenience.

Sincerely yours,



John S. Hahn

cc: Ted Yakulic  
John M. Greifzu, Jr.